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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|---|
| UNITED STATES OF AMERICA, |) | Case No.: CR 15-00133 MMC |
| |) | |
| Plaintiff, |) | STIPULATION AND PROPOSED ORDER |
| v. |) | |
| |) | TO CONTINUE TO JULY 15, 2015 |
| LOURDES CURCIO, |) | |
| |) | |
| Defendant. |) | |
| |) | |

The defendant, LOURDES CURCIO, represented by Rebecca Feigelson, and the government, represented by Daniel Talbert, Special Assistant United States Attorney, stipulate to continue the defendants' status hearing, currently set for July 1, 2015, until July 15, 2015. Counsel for the defendant and the government are attempting to negotiate a resolution of this case. The parties anticipate that the July 15, 2015 date can be set on calendar for a change of plea.

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1 The parties further stipulate that, based on the need for counsel to review the proposed resolution
2 of this case, the time between July 1, 2015, and July 15, 2015, be excluded from the Speedy Trial Clock
3 for effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (b)(iv).

4 Dated: June 30, 2015

Respectfully submitted,

5 MELINDA HAAG
6 United States Attorney

7 s/ Daniel P. Talbert
8 DANIEL P. TALBERT
9 Special Assistant United States Attorney

10 Dated: June 30, 2015

BY s/ Daniel P. Talbert for Rebecca Feigelson
REBECCA FEIGELSON
Attorney for Defendant
(as authorized by email)

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~~PROPOSED~~ ORDER

Based upon the representations of counsels and for good cause shown, the Court orders that the status hearing for the defendant shall be re-set for July 15, 2015, at 2:30 pm, for change of plea. Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between July 1, 2015, and July 15, 2015, would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between July 1, 2015, and July 15, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between July 1, 2015, and July 15, 2015, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: July 1, 2015


HON. MAXINE M. CHESNEY
United States District Judge